

**Designing a World for All
Accessibility Framework for
Virginia Community
College System
V2.0**

Revision History

Version #	Date	Changes	Prepared/ Changed By	Reviewed By	Approved By
V1.0	21-Nov-2025	Initial Version	LearningMate	Steering Committee	Sheri Prupis
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Executive Summary

a. Purpose of the Framework

This Accessibility Framework provides Virginia Community College System (VCCS) with a practical, campus-wide plan to ensure compliance with U.S. federal and state accessibility laws and to promote access to information, services, and learning opportunities for all students, faculty, staff, and community members.

The framework sets clear expectations for accessibility in courses, administrative content, procurement processes, facilities, and technology. It also introduces risk and priority models to guide decision-making and resource allocation, ensuring that the College meets regulatory requirements by the April 24, 2026, federal compliance deadline.

b. Scope and Applicability

This framework applies to:

Academic units – including all digital teaching and learning materials, such as, but not limited to, courses, syllabi, readings, and third-party instructional content.

Administrative units – covering all digital and communication materials created or managed by college departments, such as websites, online forms, promotional materials, internal and external communications, documents, and digital platforms like student information systems, financial aids, HR systems, scheduling platforms, and library databases used by staff.

Technology services – including the learning management system (LMS), websites, digital signage, and applications.

Procurement and vendor relationships – ensuring accessibility requirements are part of the purchasing or renewing technology and content process.

It does **not** apply to archival content that is clearly marked and not in active use.

c. Benefits to the College

Regulatory Compliance – Meeting Americans with Disabilities Act (ADA), Section 504, Section 508, and Web Content Accessibility Guidelines (WCAG) 2.1 Level AA standards avoid legal exposure and protect the College's reputation.

Improved Student Success – Accessible content ensures all students, including those with disabilities, can engage fully with courses and services.

Operational Efficiency – Clear policies, inventories, and processes reduce duplication of effort and establish consistent practices across the College.

Future-Proofing – By embedding accessibility into daily workflows, the College minimizes future remediation costs and positions itself as a leader in accessible education.

Community Trust – Demonstrating accessibility as a campus value reinforces the College’s commitment to serving its diverse student body and regional community.

Introduction

a. What is Accessibility in Higher Education?

VCCS is committed to ensuring that all students, faculty, staff, and visitors can access and use all programs, services, and information without barriers, in compliance with ADA Title II, Section 504, Section 508, and WCAG 2.1/2.2.

Accessibility in higher education means ensuring that all students, faculty, staff, and community members can access and benefit from the College’s programs, services, and information. This includes physical environments, digital platforms, learning materials, and administrative communications.

For community colleges, accessibility is not optional—it is both a legal mandate and central to the College’s mission of providing broad access to education and workforce training.

b. Legal, Regulatory, and Accreditation Context

The framework is built around below primary regulatory foundations:

Law/Standard	Scope/Applicability	What It Requires	Implications for Community Colleges
ADA Title II	Public institutions (state & local government, including community colleges)	Programs, services, and activities must be accessible to individuals with disabilities	All College programs, services, and activities must be accessible, both physically and digitally
Section 504	Programs receiving federal funding	Prohibits discrimination against individuals with disabilities	Any program or service receiving federal funds (financial aid, student support services, etc.) must be accessible
Section 508	Federal ICT and entities receiving federal funds	Information and Communication Technology (ICT) must meet accessibility standards	Websites, LMS, digital docs, kiosks, and communication tools must be accessible

Law/Standard	Scope/Applicability	What It Requires	Implications for Community Colleges
WCAG 2.1	Global web accessibility guidelines (W3C)	Technical standards organized under POUR (Perceivable, Operable, Understandable, Robust)	All web and LMS content, online learning materials, and digital communications should conform to WCAG 2.1 Level AA

In addition, state laws and accreditation standards reinforce these requirements, often requiring documentation of accessibility efforts during accreditation reviews.

c. Compliance and Risk Management

Accessibility is both a compliance requirement and a risk management issue. Colleges that do not address accessibility may face:

- Complaints under ADA or Section 504,
- Investigations by the Office for Civil Rights (OCR),
- Litigation and financial penalties, and
- Reputational damage within the community and state system.

At the same time, accessibility represents an opportunity. By developing a structured framework, VCCS can reduce risk, prioritize resources effectively, and ensure long-term compliance in a sustainable way.

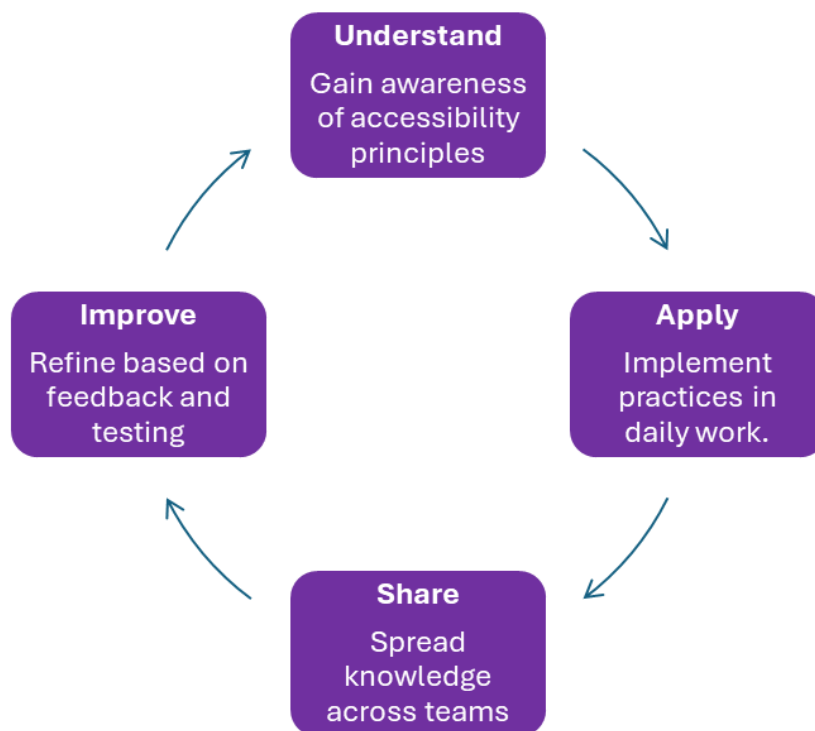
1.Awareness and Engagement

1.1. Building Accessibility Awareness Across Campus

Building awareness is the foundation of accessibility. Many accessibility challenges in higher education stem not from unwillingness, but from lack of understanding of what accessibility means in practice.

To guide awareness efforts, VCCS will use the Accessibility Awareness Cycle:

- **Understand** – Faculty, staff, and students learn the basics of accessibility, including legal requirements and practical examples.
- **Apply** – Individuals put that knowledge into practice in their daily work (e.g., making course syllabi accessible, captioning videos, designing accessible forms).
- **Share** – Awareness is multiplied when individuals share tips, tools, and lessons learned within departments and across campus.
- **Improve** – Accessibility is a continuous process; feedback from students, audits, and testing is used to improve materials and training.



This model reinforces that accessibility is not a **checklist item** but a **continuous cultural practice**. By cycling through these stages, the College can ensure accessibility awareness remains active, relevant, and sustainable.

Ensure the cycle is not just conceptual but practical:

- **All faculty and staff** complete baseline training required by their college (Understand + Apply).

- **College professional development including faculty and instructional designers, CETL staff, HR are encouraged** to share practices with peers.
- **Administrative staff** should share resources across departments and engage in Improve by refining document and content workflows.
- **VCCS and college leadership** plays a key role in institutionalizing the cycle through continuous improvement mechanisms such as procedural updates, procurement reviews, and annual reporting.

This structured connection between the **cycle and training requirements** ensures awareness translates into measurable behaviour change across all campus roles.

1.2. Accessibility as an Institutional Value

Accessibility at VCCS is not only a legal requirement but also a reflection of the institution's public mission to provide direct access to education. By framing accessibility as a **core institutional value**, the College communicates that accessibility is integral to academic quality, operational excellence, and community trust.

1.2.1. Embedding Accessibility in College Culture

For accessibility to be more than a compliance requirement, it must be embedded into the College's culture. This happens across four interconnected layers:

- **Mission and Strategy** – Accessibility is explicitly referenced in the College's mission, vision, and long-term strategic plan.
- **Policies & Governance: VCCS Policy 9.1 of the Information Technology Policies** – Formal policies, procurement standards, and accountability frameworks ensure accessibility is not optional.
- **Daily Practice** – Faculty, staff, and students apply accessibility in teaching, administration, and communication.

This is illustrated in the Institutional Value Pyramid below.



1.2.2. Leadership Role in Setting Values

- Publicly endorse accessibility commitments in speeches, board meetings, and policy documents.
- Allocate funding for training, tools, and remediation.

1.2.3. Faculty and Staff Role in Living the Value

- Faculty integrate accessibility into course design, ensuring syllabi, readings, and multimedia are usable by all students.
- Administrative staff apply accessibility checks when producing documents, forms, and digital content.
- IT staff ensure that technology systems and vendor platforms support accessibility standards.

1.2.4. Students and Community Impact

When accessibility is treated as a value, students experience it as a core part of their educational journey—not as a special accommodation. This reinforces the College's role as a trusted institution that welcomes everyone in the community.

1.3. Awareness Campaigns and Training Programs

Accessibility must be reinforced through structured campaigns and tailored training programs. These efforts ensure that every stakeholder knows not just why accessibility matters, but how to implement it in their daily work.

1.3.1. Awareness Campaigns

Awareness must be reinforced through structured campaigns and targeted training programs. These efforts ensure that every stakeholder understands not just why accessibility matters, but how to apply it consistently in their role.

- **“Born Accessible” Campaign**
 - A College-wide initiative to design latest content (documents, videos, web pages, courses) with accessibility in mind from the start.
- **Monthly Accessibility Tips**
 - Short tips distributed via newsletters or digital signage.

Sample Accessibility Tip of the Month

“Did you know? Using heading styles in Word and PowerPoint makes your content easier for screen readers and helps you generate automatic tables of contents.”

- **Accessibility Awareness Week**
 - A week each semester with workshops, demonstrations of assistive technologies, and student/faculty displays.

1.3.2. Training Programs

Training should be **modular, role-specific, and continuous**.

Require regular progress reports to maintain visibility and accountability.

Audience	Training Focus	Delivery Format	Frequency
Leadership & Board	Legal obligations, risk management, resource allocation, monitoring metrics	Briefings, workshops	Annual + as needed
Faculty	Universal Design for Learning, Accessible course design, Canvas accessibility tool, captioning multimedia, accessible syllabi	Workshops, online modules, peer sessions	New hire + annual refresh
Administrative Staff	Creating accessible documents (Word, PDF, Excel, PowerPoint), forms, and email	Hands-on labs, short video tutorials	Orientation + quarterly tips
IT Teams	WCAG standards, Section 508, procurement reviews, accessibility testing tools	Technical training, vendor demos	Bi-annual + updates
Students	Awareness of available resources, assistive technology use, reporting accessibility barriers	Orientation sessions, peer mentoring	Each semester

1.3.3. Integration into Professional Development

Accessibility training is not optional. To make it sustainable, the College will:

- Embed accessibility into **faculty onboarding** and **staff orientation**.
- Require accessibility activities as part of faculty professional development and review.
- Provide staff with ongoing micro-training (e.g., “15-minute Friday” refreshers).

1.3.4. Supporting Tools

To reinforce training, the College will maintain a **resource hub** with:

- Quick-reference checklists for faculty, staff, and IT.
- Recorded tutorials for on-demand access.
- Access to built-in accessibility checkers (Microsoft Office, Adobe Acrobat Pro, LMS tools).
- Links to SSC, ADA.gov, WebAIM, and internal guides.

1.4. Role-Based Engagement

Accessibility succeeds when every part of the College community participates. Distinct groups have distinct responsibilities, but they are interconnected and reinforce one another.

1.4.1. Board and Senior Leadership

- Set the tone by publicly endorsing accessibility commitments.
- Allocate resources (budget, staff time, and tools) to ensure implementation.
- Monitor progress through reports and dashboards.
- Hold departments accountable by requiring evidence of compliance.

1.4.2. Faculty and Academic Departments

- Ensure all syllabi and course schedules are fully accessible.
- Use LMS accessibility tools (e.g., Canvas accessibility tool) to check courses.
- Caption instructional videos and ensure readings, assignments, and course content meet accessibility standards.
- Participate in training and peer-to-peer knowledge sharing.

1.4.3. Administrative Staff and IT Teams

- **Administrative Staff:** Apply accessibility standards to forms, communications, and digital documents.
- **IT Teams:** Integrate accessibility testing into development and vendor review processes; maintain assistive technology infrastructure.

1.4.4. Students and Community Partners

- Students serve as advocates by identifying and reporting barriers.
- Student government and disability clubs can participate in awareness campaigns.
- Community partners (e.g., workforce training sites) should be engaged to ensure external-facing programs align with accessibility expectations.

2. Roles, Responsibilities, and Governance

Accessibility requires shared responsibility across leadership, faculty, staff, and students. This section outlines how governance should be structured, what roles each group plays, and how accountability is tracked through formal mechanisms.

2.1. Institutional Governance for Accessibility

Accessibility must be embedded in the College's governance framework to ensure consistency and accountability.

Key elements of governance include:

- **Executive Sponsorship** – A designated senior leader formally champions accessibility and ensures resource allocation.
- **Policy Authority** – Accessibility standards are formally integrated into VCCS Policy 9.1.
- **Decision-Making Pathways** – Accessibility considerations are built into academic councils, steering committees, and facilities planning groups.
- **Compliance Integration** – VCCS Counsel, Human Resources, offices of disability services and accessibility, IT, and VCCS Governance Bodies are included in oversight processes to ensure adherence to federal and state requirements.
- **Alignment with VCCS IT Policy** - The VCCS policy governing accessibility compliance is defined in Section 9.1 of the Information Technology Policies. This policy establishes the systemwide responsibility for ensuring that all information and communication technology (ICT) resources are accessible to individuals with disabilities.
 - Section 9.1.0 (General) of the ICT states that “The VCCS Information Technology strategy for maintaining accessibility compliance is detailed in *VCCS Accessibility Standards and Practices*. The System Office (SO), the Shared Services Center (SSC), and each of the 23 community colleges are jointly responsible for adhering to these standards”.

2.2. Defining Roles and Responsibilities

Each campus role contributes to accessibility compliance:

- **Board of Trustees and Senior Leadership**
 - Endorse accessibility as a college-wide priority.
 - Approve budgets and major policies.
 - Review annual accessibility reports.
- **Academic Vice President, Deans, and Department Chairs**
 - Monitor course-level compliance.
 - Ensure faculty have tools and support for accessible course delivery.
 - Track reporting for academic units.
- **Faculty, Instructional Designers, Center for Teaching & Learning Directors, LMS Administrators**

- Create accessible syllabi, course materials, and assessments.
- Apply accessibility tools in the LMS and document creation software.
- Report barriers and request support where needed.
- **Administrative Staff, Academic Leadership, and IT**
 - Maintain accessible forms, PDFs, websites, and applications.
 - Verify vendor tools meet accessibility standards.
 - Provide technical support for testing and remediation.
 - As per VCCS IT Policy 9.1.2, The VCCS System Office Chief Information Officer (CIO), working in coordination with IT governance bodies, defines accessibility standards and ensures compliance with applicable local, state, and federal requirements. The Shared Services Center (SSC) and each of the 23 colleges are responsible for applying these standards for all locally controlled systems, tools, and procurements.
- **Office of Accessibility/Disability Services**
 - Advise faculty and staff on accessible practices.
 - Ensure student accommodations are supported alongside compliance.
- **Students and Campus Community**
 - Report accessibility concerns through defined feedback channels.
 - Participate in pilot testing for accessibility tools and resources.

2.3. Creating an Accessibility Committee or Task Force

A dedicated Accessibility Committee provides coordination and oversight across units.

Composition:

- Project Director: Sheri Prupis – SO
- Program Manager: Deniece Noupko - SO
- College Members:
 - VP (Academic): Kris Ogden - CVCC (Chair)
 - VP (Administrative): John Ferrari - NVCC
 - CFAC Rep: Ben Bullen –VHCC
 - Online Learning Dean: Chris Porter- VWCC
 - CIO: Tim Jones - NRCC
 - CWO: Clint Pinion - MECC
 - Disability Officer: Beth Callahan - TCC
 - Academic Dean: Nancy Severe-Barnett - Brightpoint
 - Librarian: Crystal Newell - PVCC
 - CHRO: Jennifer Bowles - P&HCC
- Ad Hoc members:
 - ITS: Dan Lepore
 - SIS: Matt Fitzgerald
 - SSC: Jen Divers
 - Librarian: Tara Cassidy

- Workforce: Angela Lawhorne
- Marketing: Jim Babb
- System Counsel: Barb Kunkel

Functions:

- Oversee accessibility procedures development.
- Create, track and review accessibility metrics.
- Advise on remediation priorities and resource allocation.
- Serve as an escalation body for unresolved issues.

2.4. Mapping Accountability Across Units

Accountability ensures tasks are completed and ownership is clear. Each accessibility activity should be tied to defined responsible and accountable roles.

2.4.1.RACI Matrix

Activity	Responsible	Accountable	Consulted	Informed
Policy development	Accessibility Committee	Academic Vice President	Legal Counsel	Board of Trustees
Course material accessibility	Faculty	Dean / Department Chair	ODS, IT	Students
LMS accessibility testing	LMS Admins & eLET IDs (where appropriate)	Director, Teaching & Learning w Technology	Faculty reps	Accessibility Committee
Campus signage & facilities	Facilities Mgmt.	VP of Operations	ODS	Campus community
Annual accessibility report	Accessibility Committee	Academic Vice President	Faculty, Staff, Students	Board of Trustees

3. Processes and Academic Integration

A framework for accessibility must be more than aspirational; it requires **repeatable processes, and integration into the academic and administrative fabric of the college**. Without clear policies, accessibility efforts risk being ad hoc and inconsistent. Without defined processes, compliance depends on individual initiative rather than institutional commitment. And without academic integration, accessibility remains peripheral instead of central to teaching, learning, and student success.

This section provides practical guidance for:

- Adhering to Policy 9.1 that defines institutional expectations and responsibilities.
- Embedding accessibility into **procurement, contracting, and vendor management**.
- Defining clear **requirements and timelines for academic courses** and third-party learning content.
- Providing **faculty guidelines** for designing and delivering accessible courses.
- Equipping **administrative units** with step-by-step processes and tools to ensure digital accessibility in the materials they produce.

By adopting and operationalizing these policies and processes, the college can ensure that accessibility is:

- **Systematic** – integrated into everyday workflows.
- **Measurable** – tied to compliance benchmarks and review cycles.
- **Sustainable** – resilient to staff turnover and technology changes.

This approach ensures that accessibility is not treated as a one-time project, but as an **ongoing responsibility across academic, administrative, and technical domains**.

3.1. Policy Development and Adoption

3.1.1. Purpose of Institutional Policy

Policies are the foundation of institutional accountability. A clear, formal accessibility policy signals the college's commitment, sets minimum standards, and defines ownership. Without policy adoption, efforts can remain fragmented and unenforceable. A written, approved, and published policy:

- Establishes the College's legal obligations under ADA, Section 504, Section 508, and WCAG 2.1.
- Defines scope: academic programs, administrative functions, technology systems, facilities, and vendor services.
- Assigns accountability for policy enforcement.
- Provides a baseline for audits and annual reviews.

3.1.2. Recommended Core Policy Components

Policy Section	Description	Owner
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Scope and Applicability	Defines who/what the policy covers (courses, admin units, vendors)	Academic Vice President
Accessibility Standards	Sets baseline standards (WCAG 2.1 AA, Section 508)	Accessibility Committee
Roles & Responsibilities	Clarifies faculty, staff, IT, and vendor duties	Accessibility Committee
Enforcement & Accountability	Defines oversight and reporting requirements	Legal / Compliance
Review & Updates	Establishes annual cycle of review	Academic Vice President
Complaints/Grievances	Outlines process for student/staff to report issues	ODS / Compliance

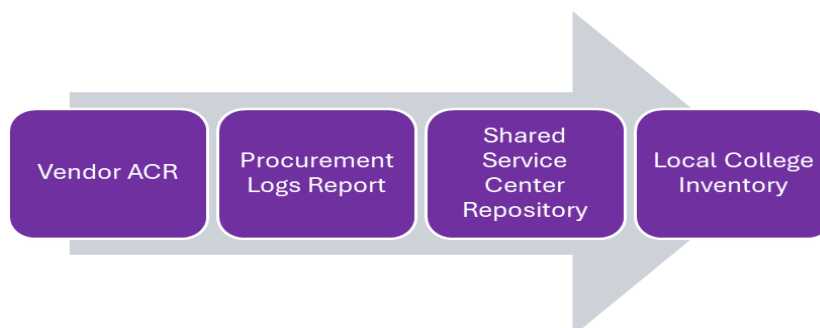
3.1.3. Policy Review and Enforcement

- Policies should be **reviewed annually**.
- Compliance reporting should be built into **departmental reviews**.
- Non-compliance should trigger corrective action or vendor remediation plans.

3.2. Accessibility in Procurement and Vendor Management

Many digital tools, applications, and content are purchased from external vendors. End users must share responsibility for identifying and evaluating a vendor's adherence to accessibility standards. Accessibility Conformance Report List

Vendors should provide **Accessibility Conformance Reports (ACRs)**, often in **VPAT (Voluntary Product Accessibility Template)** format) that document how products align with Section 508 and WCAG standards. The Shared Services Center currently collects these reports, but local tracking with self-service functionality ensures accountability.



- All ACRs are stored centrally by the Shared Services Center.

- Current state: reports are gathered, but no formal vetting process is in place.
- Action for VCCS maintains a **local inventory of ACRs**, with status noted (“Received / Not Reviewed”).

3.2.1. Procurement Accessibility Checklist

Procurement officers should use a standardized checklist during vendor selection.

Sample Procurement Accessibility Checklist:

Checklist Item	Yes/No	Notes
Vendor provided ACR/VPAT	☐	
Product assessed against WCAG 2.1 AA	☐	
Accessibility testing documentation available	☐	
Vendor remediation plan included	☐	
Contract includes accessibility clauses	☐	
Internal testing completed by IT	☐	

3.2.2. Vendor Accountability and Shared Service Center Coordination

While SSC currently manages a centralized repository for report collection, local colleges must:

- Verify vendor claims through internal testing.
- Track unresolved accessibility gaps.
- Escalate systemic issues back to SSC for system-wide resolution.

3.3. Academic Course Accessibility

Academic courses form the core student experience. If course materials are inaccessible, students face immediate barriers to success. This subsection sets deadlines and practical requirements for ensuring accessible courses by Spring 2026.

3.3.1. Course Accessibility Deadlines (Spring 2026)

All courses must be accessible no later than **January 2026**.

- Syllabus and course schedule: **100% accessible**.
- Required readings: remediated or replaced.
- Courses must score at least **85% in UDOIT Advantage**, with syllabus and schedule at 100%.

Requirement	Deadline	Standard
Syllabus & course schedule	Spring 2026	100% accessible
Required readings	Spring 2026	Accessible format
Canvas Accessibility Tool scan baseline	Spring 2026	≥ Eighty-five percent compliance
Third-party courseware	Jan 2026	Current accessible version

3.3.2.Canvas Accessibility Tool Requirements

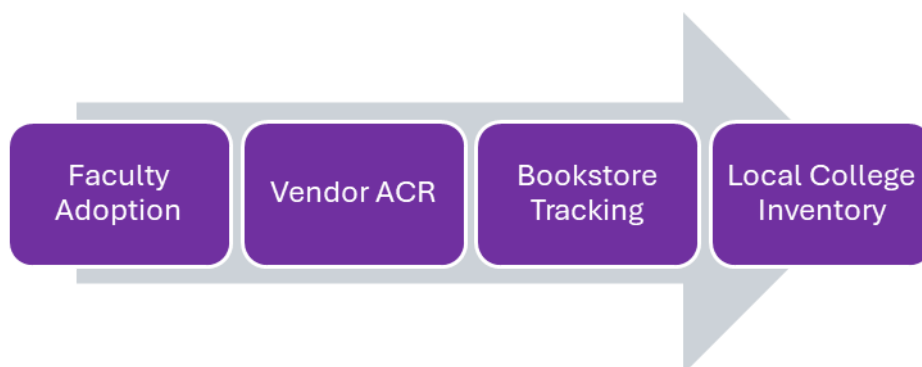
- All courses should be scanned with an accessibility Tool before Spring 2026.
- Remediation should focus first on syllabus, schedule, and required readings.

3.3.3.Handling 3rd Party Digital Course Content

Many eBooks and digital materials are purchased through the bookstore or external vendors. Colleges must:

- Require updated versions of vendor-provided content prior to the April 2026 deadline.
- Track all third-party courseware in the accessibility inventory.
- Flag content lacking accessibility documentation for remediation.

Third-Party Courseware Workflow:



3.4. Faculty Guidelines for Implementing Accessibility Requirements

Faculty are critical to ensuring course-level accessibility. Providing clear, practical guidance empowers them to design courses that meet accessibility requirements without excessive burden.

3.4.1. Faculty quick-check guide

- Syllabus uses headings and alt text for images.
- Course schedule is accessible (tables tagged, readable order)
- Required readings provided in accessible format (Word, PDF, ePub)
- All videos include captions.
- Assessments assessed with screen readers
- Slides meet contrast and readability standards.
- Canvas Accessibility Tool scan completed.

3.4.2. Course Syllabus and Schedule Standards

- Must be 100% accessible by start of Spring 2026 classes.
- Forms, policies, and grading breakdown must use structured headings and tables.
- **Accessibility Statement in Course Syllabus**
 - o Each course should include a brief accessibility statement in its syllabus. This statement affirms the college's commitment to accessible learning and encourages early communication when barriers arise. Colleges may customize the language to fit their local context and tone.
 - o Faculty are encouraged to place this statement prominently in the syllabus, typically near the accommodation or student support section.
 - o **Sample Statement:** "Your ability to fully participate in this course matters. If you experience any difficulty accessing course content, activities, or technology, please contact me as soon as possible so we can address the issue together. Accessibility is a shared responsibility, and your feedback helps ensure that all students have access to learning."

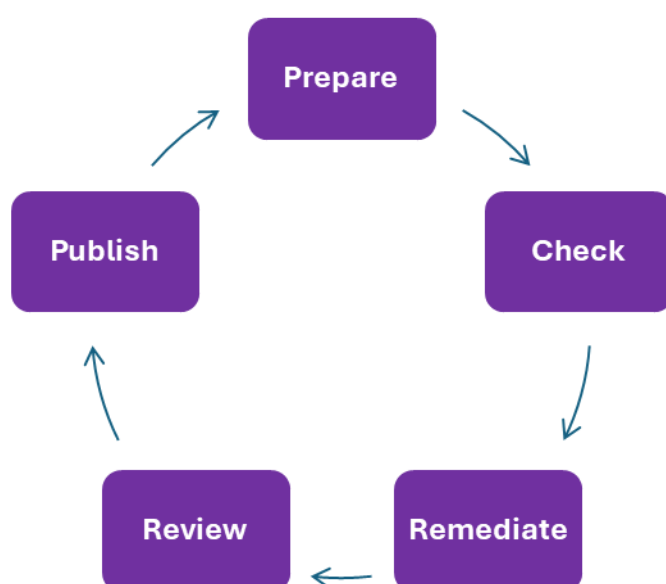
3.4.3. Accessible Teaching Materials

- Slides: High-contrast colors, readable fonts.
- Readings: Digital-first formats not scanned images.
- Assessments: LMS tools assessed with assistive tech.

3.4.4. Faculty Support and Training Resources

- Faculty should receive workshops and templates.
- Provide "how-to" guides on using MS Accessibility Checker, Acrobat tags, and captioning tools.

3.4.5. Faculty Course Accessibility Cycle



3.5. Administrative Units Accessibility Guide

Administrative departments generate large volumes of content: forms, memos, PDFs, and presentations. Standardizing their accessibility approach prevents operational barriers and reduces remediation workload.

3.5.1. Five-Step Administrative Compliance Process

- Educate staff on accessibility basics.
- Random audits of content created or shared.
- Evaluate using built-in accessibility checkers.
- Remediate or replace inaccessible files.
- Sustain by making the latest content “born accessible.”

3.5.2. Administrative Content Categories and Risk Levels

Administrative Content Categories

Category	Examples	Risk Level
Documents	Word, PDF, PowerPoint	High
Multimedia	Videos, tutorials, podcasts	High
emails		High
Online Forms	Registration, advising	High
Presentations		Medium-High
Third-party Apps	Portals, kiosks	Medium–High

Category	Examples	Risk Level
Internal Docs	HR memos, staff-only	Medium

3.5.3. Use of Accessibility Checkers

Tool	Applies To	Use Case
MS Accessibility Checker	Word, Excel, PPT, Outlook	Check content while creating
Adobe Acrobat Pro	PDF	Validate and remediate PDFs
Online Course Accessibility Tool	LMS	Scan courses for issues
Captioning Services	Video/audio	Provide transcripts

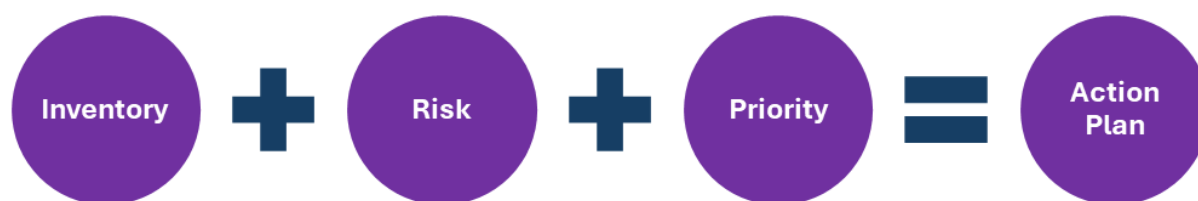
4. Inventory, Risk, and Priority Framework

Before remediation or compliance efforts can succeed, the College must first understand **what materials exist, who owns them, and which carry the highest risk**. An inventory without prioritization can overwhelm; prioritization without an inventory creates blind spots.

This framework provides a structured approach to:

- **Inventory:** Individual responsibility for identifying and cataloguing all materials, systems, and content.
- **Risk:** Determining which items could create the most legal, reputational, or operational exposure if inaccessible.
- **Priority:** Sequencing remediation work against compliance deadlines and resource capacity.
- **Disposition:** Deciding which materials to remediate, archive, or delete (“offload”).

By applying this stepwise model, VCCS can ensure that **high-risk, high-priority items are addressed first**, while also managing workload efficiently across faculty, staff, and administrative units.



A standardized Digital Accessibility Inventory and Prioritization Matrix have been provided by the System Office in the accompanying Excel file. This template is included as Appendix B and should be used to record digital assets, apply risk scores, and calculate remediation priorities based on the criteria outlined in this section.

4.1. Building and Managing an Accessibility Inventory

4.1.1. Developing a Campus-Wide Accessibility Inventory

A campus-wide accessibility inventory is the foundation of this framework. It captures all content and systems that may require accessibility review and remediation.

What to Include:

- Course materials (syllabi, readings, assessments)
- Administrative documents (financial aid forms, HR policies)
- Digital platforms (LMS, portals, departmental websites)
- Multimedia (videos, podcasts, online lectures)
- Physical/digital signage and kiosks
- Third-party courseware and e-books

4.1.2. Assigning Ownership and Responsibility for Updates

Clear ownership ensures the inventory remains current. Each unit must identify who is accountable for maintaining their part of the inventory.

Category	Examples	Owner	Responsibility
Course Docs	Course syllabus, lecture slides	Faculty	Upload updates, certify accessibility
Student Services Docs	Financial aid forms, advising guides	Director, Student Services	Ensure PDFs meet standards
Course Docs	LMS templates, departmental sites	Faculty, Deans	Assess accessibility, log compliance status

4.1.3. Establishing Accountability Mechanisms

Accountability mechanisms prevent “gaps” between inventory maintenance and compliance.

- **Annual Reviews:** Everyone confirms their inventory.
- **Compliance Dashboard:** Tracks accessibility status in real time.
- **Escalation:** Unresolved high-risk items flagged to the Accessibility Committee.
- **Sample Tool:** A **RACI matrix** (Responsible, Accountable, Consulted, Informed) can clarify roles.

4.2. Applying Risk Determination Framework

Risk analysis ensures the College focuses on **what matters most first**. Not all materials pose the same level of legal, operational, or reputational exposure. A syllabus that students must read on Day 1 carries far higher risk than an archived departmental memo.

This framework provides criteria and scoring methods to assess accessibility risk consistently across the institution.

4.2.1. Assessing Risk in Public-Facing Materials

Public-facing content includes **any information visible to the public without login credentials**, such as:

- College website (admissions, course catalogue, financial aid)
- Public brochures, policy documents, or press releases.
- Campus maps, event schedules, or announcements

Why this matters:

- Public-facing content represents the College’s **commitment to accessibility**.
- Noncompliance risks immediate visibility, complaints, or legal exposure.

- These materials are always **High Risk**.

4.2.2. Evaluating Risk Based on Student Impact

Student-facing content is the most critical category. This includes:

- Syllabi, required readings, assessments.
- Advising tools, financial aid applications, registration forms
- Courseware in the LMS

Why this matters:

- Direct impact on learning and student success.
- Noncompliance can trigger **Section 504 violations**.
- Considered **High Risk** if inaccessible.

4.2.3. Evaluating Risk Based on Faculty Impact

Faculty need accessible tools and resources to:

- Create accessible courses.
- Grade and assess students fairly.
- Access HR, payroll, and academic systems

Why this matters:

- Faculty inability to use systems can block course delivery.
- This poses both an **operational risk** and a compliance risk under ADA Title II.
- Scoring can vary: High if tied to teaching delivery, Medium if tied to administrative tasks.

4.2.4. Incorporating Operational and Institutional Risk Factors

Operational documents may not directly affect students but still sustain College operations. Examples:

- HR forms
- Budget templates
- Departmental reports

Why this matters:

- Inaccessibility can reduce staff efficiency, increase errors, and create liability.
- Generally scored **Medium Risk** unless the issue directly impacts compliance.

4.2.5. Considering FOIA, Protest, and Due Diligence Requests in Risk Analysis

Certain materials may not be public facing by default but must be **produced upon request**:

- Board minutes
- Historical reports
- Administrative emails subject to FOIA

Why this matters:

- If inaccessible, such documents expose the College during protests, audits, or legal reviews.
- These are scored **Medium Risk** but can escalate if politically sensitive.

4.2.6. Applying the Risk Scoring Model (High, Medium, Low)

The scoring model translates qualitative judgments into consistent, trackable numbers.

Risk Question	Yes	No
Is this public-facing?	+3 (High)	0
Will this impact students?	+3 (High)	0
Will this impact faculty?	+3 (High)	0
Available upon request (FOIA, protest)?	+2 (Medium)	0
Does this impact operations?	+2 (Medium)	0
Could the College appear inactive if challenged?	+2 (Medium)	0
Internal only (staff)?	+2 (Medium)	0

4.3. Applying a Priority Determination Framework

Risk tells us *what is most important*. Priority tells us *when it must be fixed*. Together, they allow the College to manage workload, ensure compliance, and avoid last-minute crises.

The Priority Framework uses a **scoring scale (0–5)** tied directly to deadlines. This ensures faculty, staff, and administrators have a shared understanding of urgency.

4.3.1. Compliance Deadline of April 24, 2026, as a Benchmark

All accessibility remediation efforts are anchored to the **federal compliance deadline** of April 24, 2026. Materials most visible or impactful to students must be remediated **before this deadline** and ideally phased in earlier to reduce risks.

Benchmarks for planning:

- **By March 2026:** Highest-risk public-facing/student-facing content must be identified and remediated.
- **By March 2026:** All syllabi, course schedules, and required readings should be fully accessible.
- **By January 2026:** All Spring 2026 courses must use updated third-party content and accessible syllabi.

- **By April 24, 2026:** Compliance across all public-facing and instructional materials.

4.3.2. Using a Priority Scoring Scale (0–5) with Defined Timelines

The Priority Scale converts deadlines into clear numbers so they can be tracked alongside risk scores.

Priority Scoring Table

Score	Definition	Timeline	Example
0	Never	Not required for compliance	Archived files, outdated drafts
1	End of February 2026	Lowest urgency	Internal memos not impacting students
2	End of January 2026	Medium urgency	Administrative forms used occasionally
3	End of December 2025	High urgency	Course syllabi, schedules
4	End of November 2025	Extremely high urgency	Admissions web pages, financial aid docs
5	Immediate	Urgent, cannot wait	Online registration form broken for screen reader

4.4. Combining Risk and Priority to Guide Remediation Decisions

Once risk and priority scores are assigned, they must be combined to generate a **remediation roadmap**. This ensures the College is not only working on the *right materials* but also completing them in the *right order*.

Without this step, staff may spend time remediating low-impact, low-urgency materials while high-risk, compliance-critical documents remain unresolved.

Sample Risk–Priority Matrix Table

Priority Score	Low Risk (1)	Medium Risk (2)	High Risk (3)
0 – Never	Archive	Archive	Reassess necessity
1 – End of Feb 2026	Fix if time allows	Plan remediation	Must be remediated by deadline
2 – End of Jan 2026	Optional remediation	Should remediate	Must be remediated

Priority Score	Low Risk (1)	Medium Risk (2)	High Risk (3)
3 – End of Dec 2025	Should remediate	High priority	Must be fully remediated
4 – End of Nov 2025	High priority	Urgent remediation	Critical remediation
5 – Immediate	Urgent remediation	Critical remediation	Emergency remediation

4.5. Developing a Materials Disposition Strategy

Accessibility compliance does not mean that **every document ever created** by the College must be remediated. Attempting to make all historical and low-value materials accessible would overwhelm resources. Instead, the College will apply a **materials disposition strategy** to decide whether items should be **remediated, archived, or deleted**.

This strategy ensures compliance while also focusing staff time on materials that provide the most value to students, faculty, and the public.

4.5.1. Establishing Criteria for archiving vs. deletion (“offloading”)

When reviewing the accessibility inventory, each item will be evaluated against the following **disposition options**:

- **Remediate**
 - Actively used in instruction or operations.
 - Public-facing or student-facing.
 - Required by compliance (e.g., syllabi, catalogue, forms).
- **Archive**
 - Not actively used but must be retained for records (e.g., accreditation evidence, compliance history, faculty senate minutes).
 - Clearly labelled “**Archived – Not in Use**” and stored in a way that avoids confusion with live content.
 - Accessibility remediation may be deferred, unless specifically requested (e.g., FOIA).
- **Delete (Offload)**
 - Redundant, outdated, or trivial materials.
 - Drafts superseded by newer versions.
 - Content that has **no instructional, operational, or compliance value**.
 - Must follow College records retention schedules and legal counsel guidance.

Table: Materials Disposition Examples

Category	Disposition	Rationale
Spring 2026 syllabus	Remediate	Student-facing, required for instruction
Faculty Senate minutes 2019	Archive	Not active, may be needed for records
Draft HR policy (outdated)	Delete	Superseded by final policy, no compliance value

4.5.2. Aligning Materials Disposition with SSC Guidance

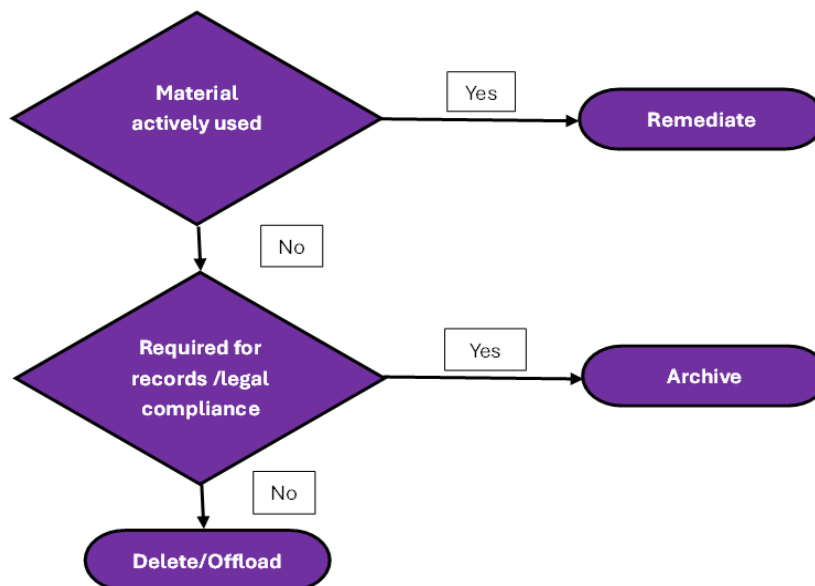
The State Steering Committee (SSC) has advised that not all content requires remediation. Instead, institutions should:

- **Apply risk and priority scoring** first.
- **Offload materials** that are outdated or irrelevant.
- **Archive important but inactive content** with proper labelling.
- **Focus remediation efforts** on high-risk, high-priority content.

Alignment ensures:

- Resources are not wasted remediating low-value materials.
- The College meets April 24, 2026, compliance without scope creep.
- Decision-making is consistent with system-wide standards.

4.5.3. Materials Disposition Workflow



5. Standards, Techniques, and Tools

Standards, techniques, and tools are the **foundation of accessibility compliance and practice**. Without them, policies cannot be operationalized. For U.S. community colleges, the most critical anchor is the **Web Content Accessibility Guidelines**

(WCAG) 2.1 Level AA, as required under the **ADA Title II final rule (2024)** and referenced in **Section 508**.

This section outlines:

- The standards that govern digital accessibility.
- Practical techniques for applying them to web, documents, and multimedia.
- Tools that help validate accessibility.
- Assistive technologies students may use to engage with digital content.

5.1. Accessibility Standards for Higher Education

5.1.1.WCAG 2.1 Principles (POUR Framework)

WCAG 2.1 Level AA is the **current enforceable standard** in the U.S. under ADA Title II (2024). It builds on WCAG 2.0 and is designed to ensure digital content works for people with a wide range of disabilities.

Principle	Definition	Examples in College Context
Perceivable	Content must be presented in ways all users can perceive	Captions on lecture videos, alt text for images
Operable	Users must be able to operate all functions	Keyboard navigation in the LMS, skip navigation links
Understandable	Information and navigation must be predictable	Consistent LMS menus, clear quiz instructions
Robust	Content must work with assistive technologies	Screen reader compatibility for syllabi and PDFs

WCAG 2.2 was finalized in October 2023. It introduces **nine additional success criteria** beyond WCAG 2.1, focusing on users with low vision, cognitive, and motor disabilities.

- **Not yet legally required** but recommended as futureproofing.
- Colleges can begin to incorporate 2.2 into workflows, especially for new digital tools and LMS content.

5.1.2.Section 508 ICT Standards

Section 508 applies to electronic, and information and communication technology (ICT) procured or developed by public institutions. For colleges, this means:

- Any software, web app, or platform purchased or created internally must comply.
- Contracts should require vendors to provide Accessibility Conformance Reports (ACRs/VPATs).

5.1.3. Universal Design for Learning (UDL)

UDL is not a compliance standard, but it complements WCAG by guiding **teaching practices**.

- **Multiple means of engagement** – give students flexible ways to participate.
- **Multiple means of representation** – present content in varied formats.
- **Multiple means of expression** – allow diverse ways for students to demonstrate learning.

5.2. Techniques for Digital Accessibility

5.2.1. Web and LMS Content

- Use **semantic HTML** (headings, lists, ARIA labels).
- Ensure **color contrast** meets WCAG 2.1 AA.
- Use **descriptive hyperlinks** (“Register for Classes” not “Click Here”).
- LMS content should pass **Canvas Accessibility Tool scans**.

Checklist: Web/LMS Content

- Heading levels structured
- Descriptive links used
- Contrast ratio $\geq 4.5:1$.
- Forms labelled
- Canvas Accessibility Tool scan completed.

5.2.2. Multimedia (video, audio, captioning)

- Captions required for all video content.
- Transcripts required for all audio content.
- Audio description required where visuals convey essential information.

Type	Requirement	Tool/Method
Video	Captions	Canvas Studio, Kaltura, YouTube captions (reviewed)
Audio	Transcript	AI transcription + human edit
Visuals	Audio description	Narration track added

5.2.3. Documents (Word, PDF, PowerPoint, etc.)

- Use **built-in heading styles**.
- Tag PDFs and avoid image-only scans.
- Add **alt text** for all visuals.
- Ensure tables are simple with defined headers.

5.2.4. Common Document Issues and Fixes

Issue	Fix
Scanned image-only PDF	Apply OCR + tagging
Missing image descriptions	Add alt text
Low-contrast text	Adjust color contrast
Complex tables	Simplify or add headers

5.2.5. Accessible Document Checklist

- Images have alt text.
- Headings applied
- Lists use bullets/numbers.
- Links descriptive
- Tables have headers, no merged cells.
- Document passes MS/Adobe accessibility checker.

5.3. Assistive Technologies and Student Support

Colleges must ensure compatibility with assistive technologies and provide student support.

Technology	Use Case
Screen Readers (JAWS, NVDA)	Blind/low vision access
VoiceOver, TalkBack	Mobile screen readers
Screen Magnifiers	Low vision access
Speech Recognition (Dragon)	Hands-free navigation
Alternative Keyboards/Switches	Motor access needs
Captioning Tools	Deaf/hard of hearing

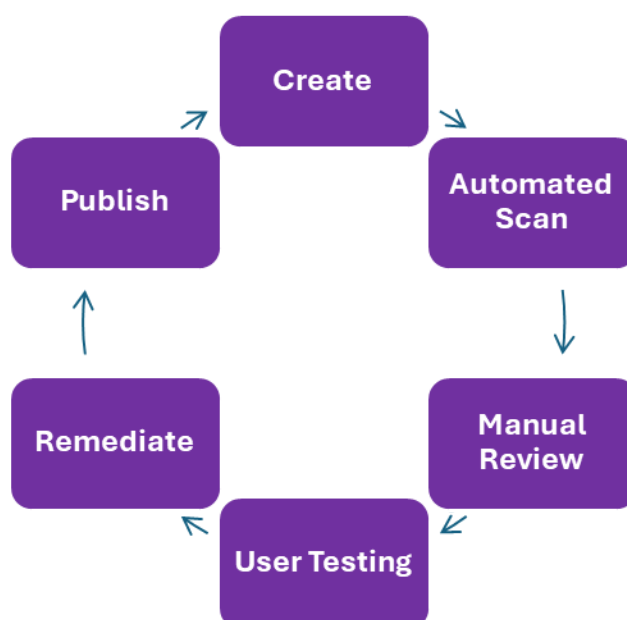
5.4. Accessibility Testing Tools and Processes

5.4.1. Automated Tools vs. Manual Testing

Automated tools are quick but limited. Manual review captures usability and context.

Method	Strengths	Limitations
Automated	Fast, scalable	Miss context/logic
Manual	Context-sensitive	Time-intensive
User Testing	Real-world feedback	Not always feasible

5.4.2. Testing Process Flow



6. Implementation Roadmap

This section provides a structured roadmap for implementing accessibility across the college over a 3-year horizon. The roadmap ensures a **phased and measurable rollout** of accessibility initiatives — beginning with policy and awareness, moving through technology and process integration, and maturing into continuous improvement and accountability.

The implementation plan is designed to help the college:

- Translate the framework into actionable steps.
- Sequence activities based on priority and readiness.
- Align resources, governance, and communication.
- Meet key regulatory milestones, including **ADA Title II compliance** by April 2026.

A successful implementation depends on strong leadership commitment, department-level accountability, and sustained training and monitoring.

6.1. Developing a Campus Accessibility Plan

The campus accessibility plan is the operational blueprint for putting the framework into action. It connects strategic goals with execution, ensuring all departments move in a coordinated and measurable way toward compliance and accessibility readiness.

Key Components of a Campus Accessibility Plan

Component	Purpose	Example / Action Step
Vision and Goals	Define the college's desired end-state for accessibility.	All instructional and administrative materials meet WCAG 2.1 AA by 2026.
Governance and Roles	Clarify responsibility for policy, implementation, and monitoring.	Accessibility Steering Committee oversees progress.
Scope and Priorities	Identify focus areas (instructional materials, websites, facilities, procurement).	LMS, student-facing documents, and multimedia prioritized.
Timeline and Milestones	Set 3-year phased targets.	Annual progress reviews tied to compliance deadlines.
Metrics and Evaluation	Define measurable indicators of success.	% of courses with accessible syllabi; # of staff trained.

6.2. Phased Approach to Implementation

A phased approach allows the college to start with achievable objectives and scale gradually. The proposed timeline balances urgency (to meet April 2026 compliance) with sustainability and operational feasibility.

Each phase builds on the previous one — from establishing foundational governance to scaling college-wide compliance.

6.2.1. Short-term (0–6 months)

Objective: Establish the foundation and quick wins.

Focus Areas:

- Form the **Accessibility Committee** and assign roles.
- Conduct a **baseline accessibility inventory** of websites, documents, and digital systems.
- Draft and adopt the **Accessibility Policy**.
- Launch campus-wide **awareness and training sessions**.
- Integrate accessibility into procurement workflows.

Deliverables:

- Approved Accessibility Policy.
- Published implementation plan and timeline.
- List of high-risk materials and systems.
- Training completion report for all administrative staff.

6.2.2. Medium-term (6–18 months)

Objective: Build institutional capability and enforce compliance.

Focus Areas:

- Embed accessibility requirements into course design templates and LMS content.
- Implement procurement accessibility checklists and vendor accountability.
- Begin systematic remediation of legacy content.
- Introduce periodic audits (website, LMS, documents).
- Expand faculty and IT training focused on tools and testing.

Deliverables:

- Departmental accessibility action plans.
- 60–70% compliance for key digital assets.
- First internal audit report.
- Vendor conformance repository (VPAT/ACR database).

6.2.3. Long-term (18–36 months)

Objective: Institutionalize accessibility as standard practice.

Focus Areas:

- Establish a continuous improvement process tied to annual reviews.
- Ensure all course materials and systems meet WCAG 2.1 AA standards.
- Integrate accessibility metrics into institutional KPIs and performance evaluations.
- Formalize annual reporting to leadership and the community.
- Review and update the Accessibility Policy to reflect regulatory or technological changes.

Deliverables:

- Fully operational accessibility governance structure.
- 100% of instructional materials meet accessibility criteria.
- Annual report and dashboard published.
- Policy version 2.0 (reviewed and updated).

6.2.4. Roadmap Timeline

Accessibility Roadmap Timeline (2025–2028)

Phase	Timeline	Key Deliverables
Foundation	0–6 months	Procedure, inventory, training
Scale-Up	6–18 months	Faculty rollout, remediation, audits
Sustain	18–36 months	Continuous improvement, reporting

6.3. Capacity Building and Training

Building internal capability is critical to sustaining accessibility practices. This section outlines the college’s strategy for developing and maintaining staff competence in accessibility standards, tools, and compliance procedures.

Approach:

- **Role-Based Training:**
Develop separate training paths for faculty, IT, content creators, procurement teams, and leadership.
 - Faculty: accessible course design, document preparation.
 - IT teams: WCAG testing, remediation tools.
 - Procurement: accessibility evaluation during vendor onboarding.
- **Blended Learning Model:**
Combine self-paced eLearning modules, workshops, and live demonstrations.
- **Certification and Tracking:**
Maintain a record of completion and periodic refresher training.

- **Peer Support Model:**

Appoint accessibility “champions” in each department to assist others.

Role	Training Focus	Frequency
Faculty	Course content, syllabus, document creation	Annual
IT Staff	WCAG	Semi-annual
LMS Admin/Instructional Designer/Disability Officer	LMS testing, Assistive Technology	Semi-annual
Procurement and End Users	VPAT, vendor compliance	Annual
Leadership	Governance, monitoring	Annual

6.4. Partnerships with SSC, External Experts, and Community Resources

Partnerships enhance capability, bring external expertise, and provide access to evaluation and training resources. For community colleges, collaboration ensures alignment with state-level expectations and shared best practices.

Partner Type	Purpose / Value	Example Activities
External Accessibility Consultants	Specialized testing, audits, and remediation	Conduct annual audits or complex PDF evaluations
Peer Institutions	Benchmarking and shared learning	Participate in state accessibility network
Community and Student Resources	Feedback and usability testing	Student advisory panel on accessibility

7. Monitoring, Evaluation, and Continuous Improvement

Accessibility compliance is not a one-time achievement—it is a continuous process that requires measurement, reflection, and improvement. Regular monitoring ensures that accessibility goals remain on track, new risks are identified early, and corrective actions are implemented consistently across academic and administrative units.

This section outlines a systematic approach for evaluating progress, tracking performance, and reporting results through measurable indicators, structured audits, and transparent feedback mechanisms.

7.1. Accessibility Metrics and Key Performance Indicators (KPIs)

Key Performance Indicators (KPIs) provide a quantifiable way to measure how effectively the college is meeting its accessibility objectives. Tracking these indicators ensures that compliance efforts are transparent, data-driven, and sustainable.

Core KPI Categories

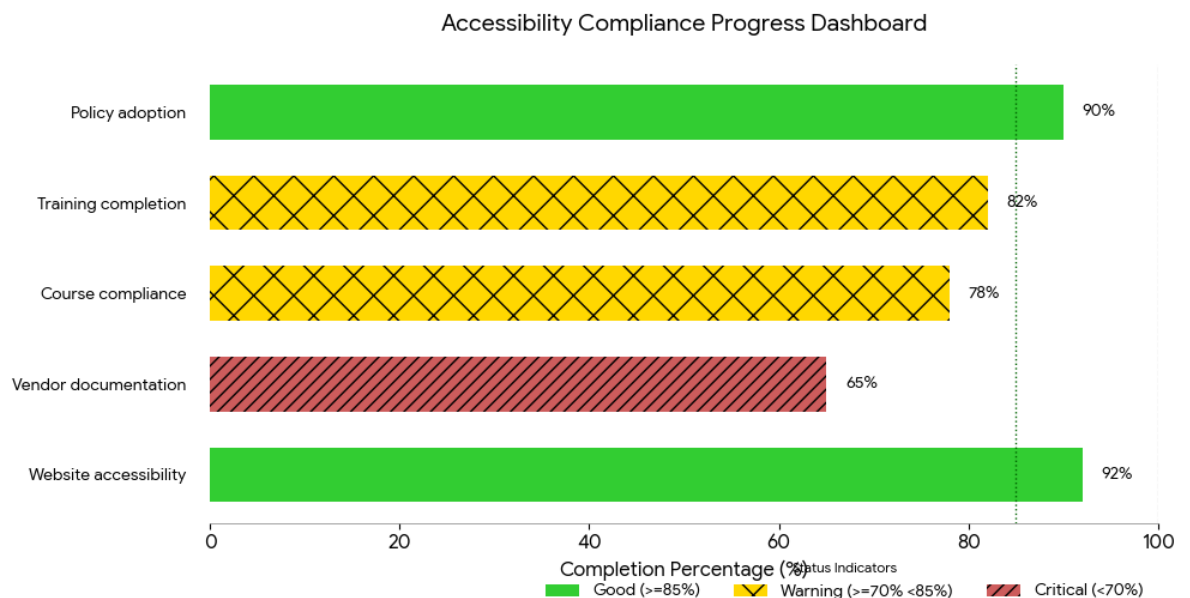
Category	Example Metrics	Frequency	Responsible Unit
Policy & Governance	Number of active accessibility policies reviewed/approved; % of units with documented accessibility roles	Annual	Office of Compliance / Accessibility Committee
Training & Awareness	% of employees completing accessibility training; number of awareness sessions conducted	Quarterly	HR / Professional Development
Digital Content	% of new documents meeting accessibility standards; % of websites passing automated checks	Monthly / Quarterly	IT / Web Services
Academic Content	% of courses meeting Canvas Accessibility Tool score $\geq 85\%$; % of syllabi 100% accessible	Each semester	Academic Affairs
Procurement	% of vendors providing valid Accessibility Conformance Reports (ACR/VPATs)	Every two years	Procurement Office

Category	Example Metrics	Frequency	Responsible Unit
Student Support	Number of assistive technology requests fulfilled; turnaround time for accessibility accommodations	Annual	Accessibility/ Disability Services

Interpretation and Use

Each unit should review its KPIs quarterly and identify corrective measures when targets are missed. The Accessibility Committee should compile results into a campus-level dashboard (see 7.1.1).

7.1.1. Sample KPI Dashboard



This dashboard should be updated quarterly and shared with senior leadership for review.

7.2. Auditing and Compliance Reviews

Regular accessibility audits validate compliance with legal standards and institutional policy. Audits can be internal (conducted by college teams) or external (led by third-party evaluators). They help identify gaps, measure effectiveness of implemented actions, and provide evidence for state or federal reviews.

Audit Components

- **Digital Systems Review** – Evaluate websites, LMS, and applications for WCAG 2.2 and Section 508 compliance.

- **Document Review** – Random sampling of PDFs, Word, and PowerPoint files for accessibility compliance.
- **Course Review** – Assess a sample of online and hybrid courses using an Accessibility Tool score.
- **Procurement Review** – Verify that vendors have provided Accessibility Conformance Reports as part of the renewal process for contracted items.
- **Facility and Equipment Review** – Confirm accessibility of digital kiosks, signage, and computer labs.

Audit Frequency

- **Full Audit:** Annually (comprehensive institutional review).
- **Spot Check Audits:** Quarterly or biannual, focusing on high-risk areas.

Deliverables

- Audit report with ratings (Compliant / Partial / Non-Compliant).
- Recommendations and timeline for remediation.

7.3. Feedback and Continuous Improvement Loops

Feedback mechanisms ensure that accessibility challenges are surfaced and resolved promptly. Feedback may come from students, faculty, staff, or community partners and should feed into a structured improvement cycle.

Core Feedback Channels

- **Anonymous Online Form** for accessibility issues or suggestions.
- **Periodic Surveys** for faculty and students to assess usability and satisfaction.
- **Open Forums / Town Halls** to discuss accessibility progress.
- **Ticketing Systems** for tracking digital accessibility issues.

Continuous Improvement Loop

Step	Action	Owner	Timeline
1. Collect	Gather input from feedback forms, audits, and reports	Accessibility Office	Ongoing
2. Analyze	Categorize by frequency, urgency, and impact	Accessibility Committee	Quarterly
3. Prioritize	Assign priority using Risk/Priority framework (see Section 4)	Governance Team	Quarterly
4. Implement	Deploy fixes or new processes	Responsible Units	Within set deadlines
5. Communicate	Share updates via website or newsletter	Communications	Ongoing

7.3.1. Sample “You Said / We Did” feedback model

You Said	We Did	Status / Timeline
“PDFs in my department are not readable by screen readers.”	Created accessible document templates and trained staff.	Completed
“Video lectures lack captions.”	Partnered with Media Services for auto-captioning.	In Progress
“Accessibility training sessions are too long.”	Added short, self-paced micro-learning modules.	Completed

This model builds transparency and shows commitment to responsiveness.

7.4. Annual Accessibility Reports

The Annual Accessibility Report serves as the official institutional record of progress, compliance, and goals for the coming year. It supports transparency with governing bodies and ensures alignment with system-level expectations.

Recommended Contents

- **Executive Summary** – Overview of annual achievements and priorities.
- **Compliance Status** – Summary of audit findings and KPI results.
- **Training Metrics** – Staff participation and completion rates.
- **Digital Accessibility Status** – Web, LMS, and document compliance rates.
- **Procurement Summary** – Vendor documentation status and pending reviews.
- **Goals for Next Year** – Priority areas and planned initiatives.

Distribution and Review

- Submit to the President’s Office and Accessibility Committee.
- Share with the Shared Services Center (SSC) as part of system-wide reporting.
- Post an accessible summary version on the college intranet.

8. Appendices and Resources

8.1. Appendix A: Glossary of Accessibility Terms

Term	Definition
ADA (Americans with Disabilities Act)	Federal civil rights law prohibiting discrimination against individuals with disabilities. Title II applies to public colleges and universities.

Term	Definition
Section 504 (Rehabilitation Act 1973)	Prohibits discrimination in programs receiving federal funding; requires equal access for students with disabilities.
Section 508	Requires federal and state institutions to ensure ICT (Information and Communication Technology) accessibility.
WCAG (Web Content Accessibility Guidelines)	International accessibility standards: Level AA under WCAG 2.1 is current legal benchmark.
POUR	WCAG principles: Perceivable, Operable, Understandable, Robust.
VPAT / ACR	Vendor accessibility statement (Voluntary Product Accessibility Template / Accessibility Conformance Report).
Canvas Accessibility Tool	Canvas-based tool for checking and remediating course accessibility.
Shared Services Center (SSC)	System-level entity coordinating procurement, reporting, and compliance support across colleges.
Remediation	Process of correcting digital materials to meet accessibility standards.
Born Accessible	Practice of creating accessible materials from the start rather than remediating later.
Assistive Technology	Software or devices (screen readers, captioning, magnifiers) that help users with disabilities access content.

8.2. Appendix B: Accessibility Inventory & Prioritization Template

Purpose:

This appendix provides guidance on how to use the Digital Accessibility Inventory and Prioritization Matrix templates. These templates are provided separately as an Excel file titled [ADA_Digital_Accessibility_Plan.xlsx](#) (click the link below) and were supplied by the System Office. They serve as standardized tools to support colleges in documenting digital assets, assessing accessibility risk, and determining remediation priorities.

Overview of the Excel File

The Excel file contains two worksheets:

1. Digital Accessibility Inventory

A structured list for documenting college-owned or college-managed digital assets.

2. Prioritization Matrix

A tool for scoring inventory items using the risk and priority criteria defined in Section 4 of this framework.

These templates may not be modified without direction from the System Office.

<https://docs.google.com/spreadsheets/d/1rFt9wECNgr4UrvB812vE9PoocO4qr329/edit?usp=sharing&ouid=115074165724460392162&rtpof=true&sd=true>

8.3. Appendix C: Procurement and Vendor Evaluation Checklist

Purpose:

This checklist supports the procurement process described in *Section 3.2 -Accessibility in Procurement and Vendor Management*.

It helps ensure that all products and services acquired by the college meet required accessibility standards (ADA Title II, Section 508, and WCAG 2.1 AA). Departments can adapt this form for internal purchasing or RFP documentation.

Accessibility Procurement Review Checklist

Step	Verification Item	Responsible Party	Documentation / Evidence	Status
Request Accessibility Documentation	Vendor has provided a current Accessibility Conformance Report (ACR / VPAT).	Procurement / Shared Services Center (SSC)	VPAT file or vendor link	☐ Yes ☐ No
Assess Product Accessibility	Internal or SSC review completed (manual or automated).	IT / Accessibility Committee	Evaluation summary	☐ Yes ☐ No
Remediation Plan	Vendor provides written plan or timeline for addressing any known gaps.	Procurement / Legal	Plan document	☐ Yes ☐ No
Post-Purchase Review	Product tested or verified again after implementation.	IT / End-User Dept	Test results / User feedback	☐ Yes ☐ No
Annual Renewal Review	Vendor's accessibility status confirmed before renewal or upgrade.	Department / Procurement	Updated VPAT or review record	☐ Yes ☐ No

Vendor Accessibility Resources

- **Accessibility Conformance Report (ACR / VPAT):**
Required document outlining a vendor's accessibility compliance against WCAG 2.1 AA and Section 508.

- **Accessibility Conformance Report List (maintained by SSC):**
Repository of all vendor-supplied ACRs collected system-wide.
(Note: Reports are collected but not yet formally vetted for compliance.)

Usage Notes

- The checklist should be completed **before any new vendor engagement or product renewal.**
- Keep all ACRs, test reports, and signed checklists on file for audit purposes.
- Coordinate with the **Shared Services Center (SSC)** for updates to statewide accessibility requirements.

8.4. Appendix D: Faculty Accessibility Toolkit

Purpose:

This toolkit provides faculty with a **concise, practical reference** for creating, reviewing, and maintaining accessible digital courses and instructional materials. It complements *Section 3.3 - Academic Course Accessibility* and *Section 3.4 - Course Design and Faculty Guidelines*, offering quick checks, templates, and system tools to help faculty meet the college's accessibility requirements under **ADA Title II, Section 504, and WCAG 2.1 Level AA**.

Faculty Accessibility Readiness Checklist

Area	Requirement	Verification Tool / Resource	Status
Course Accessibility Target	All courses to be accessible by January 2026 (Spring semester)	Institutional Canvas Accessibility Tool Reports	☐ Yes ☐ No
Canvas Accessibility Tool	Minimum 85% accessibility score per course; Syllabus and Course Schedule must be 100% accessible	Canvas Accessibility Tool	☐ Yes ☐ No
Documents and Handouts	All Word, PowerPoint, and PDF files meet accessibility standards (headings, alt text, reading order, contrast)	Microsoft Accessibility Checker / Acrobat Pro	☐ Yes ☐ No
Multimedia (Audio/Video)	Captions, transcripts, and audio descriptions available; auto-generated captions reviewed for accuracy	Media Geeks / OLIT Support	☐ Yes ☐ No
Third-Party Course Materials	Use latest versions of third-party ebooks, simulations, or digital tools (required by Jan 2026)	Bookstore / Vendor ACR	☐ Yes ☐ No
Course Navigation	Clear and consistent module structure; keyboard accessible	Canvas Navigation Check	☐ Yes ☐ No
Assessments	Accessible quiz formats (no timed-only access without accommodation)	LMS Accessibility Settings	☐ Yes ☐ No

Faculty Accessibility Process Cycle

Stage	Faculty Action	Tools / Support
Plan	Review all materials for accessibility gaps before semester start	Prior semester feedback / UDOIT report
Create	Use college-provided accessible templates (Word, PPT, Canvas)	Microsoft / Canvas templates
Check	Run Canvas Accessibility Tool scan and built-in accessibility checkers	Canvas Accessibility Tool / Office 365 Checker
Publish	Post accessible syllabus, readings, and media	LMS upload confirmation
Review	Seek student feedback or Disability Services input	End-of-semester accessibility review
Update	Remediate and improve before next term	Faculty workshop / OLIT support

Common Accessibility Tools for Faculty

Tool	Function	Where to Access
Canvas Accessibility Checker/Remediation Tool or UDOIT Advantage (Canvas)	Scans Canvas courses for accessibility issues and provides step-by-step fixes	Canvas LMS
Microsoft Accessibility Checker	Reviews Word, Excel, PowerPoint, Outlook for accessibility	Built into Microsoft 365 apps
Adobe Acrobat Pro	Checks and remediates PDF accessibility	Installed via IT or OLIT
Captioning Services (Media Geeks)	Ensures captions and transcripts for video/audio	Request via Media Geeks portal
Training & Resources (OLIT)	Workshops and tutorials on course accessibility	OLIT webpage or staff email

Recommended Practices

- Start every semester with an **accessibility review** of all course content.
- Use **templates** provided by OLIT to reduce manual fixes.
- Avoid scanned PDFs or images of text; always provide **machine-readable documents**.
- Periodically check vendor content for **updated accessible versions**.
- Work collaboratively with the **Office of Disability Services** and **Instructional Technology** teams for guidance.

8.5. Appendix E: Administrative Unit Accessibility Toolkit

Purpose:

This appendix supports *Section 3.5 -Administrative Units Accessibility Guide* and provides a **practical, step-by-step tool** for staff and department leads who create, manage, or distribute digital materials outside academic courses.

It applies to all **administrative offices**, including Admissions, Finance, Human Resources, Student Affairs, and IT.

All administrative content must meet the accessibility requirements of **ADA Title II, Section 504, and Section 508**, as well as the college's internal digital standards.

The Five-Step Accessibility Compliance Process

Step	Action	Outcome / Verification
Understand Requirements	Review ADA Title II digital accessibility obligations and college policy.	Awareness of what "accessible" means for documents, media, and web.
Conduct a Content Audit	List all digital content your office owns or publishes (forms, videos, portals, etc.).	Comprehensive inventory using <i>Appendix B – Accessibility Inventory Template</i> .
Evaluate Accessibility	Run accessibility checks using built-in tools (Word, PowerPoint, Acrobat Pro) or external services.	Accessibility report for each file or platform.
Remediate or replace	Correct issues directly or replace non-compliant content with accessible versions.	Updated accessible materials.
Sustain and improve	Check all latest content before posting; adopt "born-accessible" creation habits.	Ongoing compliance and reduced remediation workload.

Typical Administrative Content Types

Category	Examples of Materials	Primary Responsibility
Documents & Forms	Policies, registration forms, HR forms, meeting minutes, memos	Office staff / HR / Administration
Web Content	Department pages, portals, intranet updates	Web editors / Communications

Category	Examples of Materials	Primary Responsibility
Multimedia	Announcements, tutorials, promotional videos	Marketing / Media Services
Presentations & Reports	Slide decks, newsletters, annual reports	Department heads
Third-Party Platforms	Vendor systems	System administrators / SSC coordination

Accessibility Audit Checklist

Item	Check	Tool / Resource	Status
Documents tagged and machine-readable	☐ Yes ☐ No	Microsoft Accessibility Checker	
PDFs contain correct reading order and alt text	☐ Yes ☐ No	Acrobat Pro Accessibility Check	
Videos captioned accurately	☐ Yes ☐ No	Media Geeks / YouTube auto-caption review	
Web forms labelled and keyboard navigable	☐ Yes ☐ No	Browser accessibility tools / IT support	
Third-party platform has current VPAT	☐ Yes ☐ No	SSC Vendor ACR List	

“Born Accessible” Practices for Administrative Staff

- Use official **accessible templates** for letters, PowerPoint decks, and forms.
- Always provide **alt text** for images and graphs.
- Avoid scanned or image-only PDFs; use digital-native formats.
- Keep **font sizes ≥ 12 pt** and maintain **high color contrast**.
- Before posting to intranet or sending externally, run an **accessibility check** in Word or Acrobat.
- When using a vendor system, confirm it appears on the **SSC Accessibility Conformance Report List**.

Departmental Roles and Accountability

Role	Responsibility
Department Head	Oversees accessibility compliance within the unit and reports status quarterly.
Content Creator / Staff Member	Ensures each document or post follows accessibility guidelines.
IT / Web Team	Provides technical validation, repair, and platform monitoring.
Accessibility Coordinator / Committee	Conducts annual review and training refreshers.

8.6. Appendix F: Resources and Further Reading

Purpose:

This appendix consolidates authoritative resources, tool documentation, and reference materials mentioned throughout the framework.

It serves as a central source for faculty, administrators, and IT teams seeking guidance, training, or compliance references.

Federal Laws, Regulations, and Guidance

Resource	Link	Description / Use
ADA Title II Final Rule (2024)	<u>Title II Regulations</u> <u>Fact Sheet: New Web & Mobile Accessibility Rule (Title II)</u>	U.S. Department of Justice (DOJ) guidance outlining new digital accessibility requirements for state and local governments, including public colleges.
Section 504 of the Rehabilitation Act (1973)	<u>Discrimination based on Disability</u>	U.S. Department of Health and Human Services resource explaining non-discrimination requirements under Section 504.
Section 508 ICT Standards	<u>IT Accessibility Laws and Policies</u>	Official standards for accessible information and communication technology (ICT) in federally funded institutions.
Web Content Accessibility Guidelines (WCAG 2.1)	<u>Web Content Accessibility Guidelines (WCAG) 2.1</u>	Core technical standards maintained by the W3C Web Accessibility Initiative; Level AA is current

Resource	Link	Description / Use
		compliance benchmark.
Web Content Accessibility Guidelines (WCAG 2.2)	<u>Web Content Accessibility Guidelines (WCAG) 2.2</u>	Updated version with additional success criteria; recommended for forward planning.

Practical Accessibility Guides and Tools

Topic	Link	Description / Use
WebAIM: Introduction to Web Accessibility	<u>Introduction to Web Accessibility</u>	Plain-language guide to accessibility concepts, assistive technologies, and implementation.
Microsoft Accessibility Checker	<u>Ask Microsoft Accessibility</u>	Built-in Microsoft 365 feature and help resources for identifying accessibility issues in Office apps.
Adobe Acrobat Pro Accessibility Checker	<u>Create and verify PDF accessibility (Acrobat Pro)</u>	Official Adobe documentation for creating and verifying accessible PDFs.
Canvas Accessibility Tool	<u>Canvas Accessibility Tool</u>	LMS-based accessibility checking and remediation tool used widely in higher education.
W3C Accessibility Tutorials	<u>W3C Accessibility Tutorials</u>	Comprehensive tutorials for implementing WCAG principles in web content.

Internal College Resources (Placeholder)

Resource / Office	Purpose	Contact / Link
Office of Disability Services (ODS)	ADA coordination and accommodation guidance	

Resource / Office	Purpose	Contact / Link
Online Learning and Instructional Technology (OLIT)	Faculty training, accessibility templates, and random course audits	
Media Geeks, Faculty, Students	Captioning and multimedia accessibility support	
IT Help Desk	Technical assistance for accessibility tools (Microsoft, Adobe)	
Virginia Community College System (VCCS) Shared Services Center (SSC)	Vendor ACR/VPAT repository and procurement coordination	